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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

BuildSimHub Inc., a Delaware
corporation,

Plaintiffs,

v.

Beijing Jianyi Investment Development
(Group) Co., Ltd., a China limited
company; Jianyi Investment and
Development Inc., a California
corporation; Jianyi Silicon Vally LLC, a
California Limited Liability Company;
Jianyi 1201 San Pablo LLC, a California
Limited Liability Company; and Lanhai
Su, an individual;

Defendants.

Case No.: 5:20-cv-09098-EJD

SUPPLEMENTAL DECLARATION OF
ZHENG ZHANG

Pursuant to 28 U.S.C. § 1746, I hereby declare as follows:

1. I was a representative for Plaintiff BuildSimHub Inc.

2. Between November 2018 and March, 2019, I was the CEO of Talece Inc.

3. While working as the CEO of Talece Inc., I worked alongside Mr. Ming Zhang and Ms. Lanhai Su (the Chairman and Secretary of Talece Inc., respectively), as well as a large number of personnel at Defendant Beijing Jianyi Investment Development (Group) Co., Ltd.

4. I have personal knowledge of the relationship between Mr. Ming Zhang and Ms. Lanhai Su.

A. The extramarital affair and intimate relationship between Mr. Ming Zhang and Ms. Lanhai Su

5. I have personal knowledge of the relationship between Mr. Ming Zhang and Ms. Lanhai Su, and how Defendant Beijing Jianyi Investment Development (Group) Co., Ltd.'s conducts substantial business within the United States.

6. Ms. Lanhai Su and Mr. Ming Zhang began living together since 2017, when Ms. Lanhai Su moved to the US and purchased their home together at 93 Castillo Lane, Milpitas, CA 95035.

7. Because Mr. Ming Zhang was and remains married to his wife, Ms. Lanhai Su and Mr. Ming Zhang did not formally marry each other.

8. The son of Ms. Lanhai Su and Mr. Ming Zhang (whom is also Ms. Su's second son) was born around late 2017 or early 2018.

9. Ms. Lanhai Su and Mr. Ming Zhang have also announced themselves as wife and husband on many public occasions to a large number of people. For example, as shown below, Ms. Lanhai Su and Mr. Ming Zhang attended the wedding of their friend as a couple.

10. Ms. Lanhai Su and Mr. Ming Zhang concealed their intimate relationship to the Chinese government officials because, in China, an extramarital affair is considered an act of moral turpitude and can prevent a person from seeking promotion and receiving government benefits.

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As wife and husband,

Ms. Lanhai Su and Mr. Ming Zhang attended the wedding of their close friend

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As wife and husband,

Ms. Lanhai Su and Mr. Ming Zhang attended the wedding of their close friend

I declare under penalty of perjury, that the foregoing is true and correct.

Executed on this April 6, 2021 in San Jose, California.

A handwritten signature in black ink, appearing to be 'Zheng Zhang', is written over a horizontal line.

Zheng Zhang